

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WISCONSIN

<i>Boyer v. Weyerhaeuser Company, et al.,</i>	W.D. WI Case 3:14-cv-286
<i>Heckel v. 3M Company, et al.,</i>	W.D. WI Case 3:13-cv-459
<i>Masephol v. Weyerhaeuser Company, et al.,</i>	W.D. WI Case 3:14-cv-186
<i>Pecher v. Weyerhaeuser Company, et al.,</i>	W.D. WI Case 3:14-cv-147
<i>Prust v. Weyerhaeuser Company, et al.,</i>	W.D. WI Case 3:14-cv-143
<i>Seehafer v. Weyerhaeuser Company, et al.,</i>	W.D. WI Case 3:14-cv-161
<i>Sydow v. Weyerhaeuser Company, et al.,</i>	W.D. WI Case 3:14-cv-219
<i>Jacobs v. 3M Company, et al.,</i>	W.D. WI Case 3:12-cv-899

Plaintiffs' Motion to Compel Weyerhaeuser Company's 30(b)(6) Deposition

Plaintiffs' move to compel the production of the corporate 30(b)(6) witness for Weyerhaeuser Company ("Weyerhaeuser").

1. Plaintiff served a notice for the 30(b)(6) deposition of Weyerhaeuser on November 24, 2014.
2. Following plaintiff's motion to compel a date certain, the parties agreed upon the date of May 28. (Ex. 1)
3. Plaintiffs served an amended notice on April 1, 2015. (Ex. 2)
4. Weyerhaeuser's counsel is unwilling to confirm the production of the witness for the agreed upon date. (Ex. 3)
5. Weyerhaeuser has not filed a motion for protective order to preclude producing a witness on the agreed upon date.
6. Plaintiff has consulted in good faith with Weyerhaeuser to resolve any objections.

Relief Requested

Plaintiff requests this court enter an order requiring compliance with the May 28, 2015, date or setting a date certain for the 30(b)(6) deposition of Weyerhaeuser Company.

Dated: May 15, 2015

/s/ Robert G. McCoy
Robert G. McCoy

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Certificate of Service

I hereby certify that on May 15, 2015, I caused the forgoing to be electronically filed with the United States District Court for the Western District of Wisconsin using the CM/ECF system which will automatically send all necessary notifications of this filing to CM/ECF participants in this case.

Dated: May 15, 2015

/s/ Robert G. McCoy _____
Robert G. McCoy

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